

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS
WESTERN DIVISION**

In re:)	
)	Chapter 11
SPECTRUM ANALYTICAL, INC.)	Case No. 15-30404-HJB
)	
Debtor.)	

In re:)	
)	Chapter 11
HANIBAL TECHNOLOGY, LLC)	Case No. 15-30405-HJB
)	
Debtor.)	

**EMERGENCY MOTION OF RECEIVER, W. MARK RUSSO FOR RELIEF
PURSUANT TO §543(d)(1) AND FOR REQUEST FOR EMERGENCY HEARING
AND EMERGENCY DETERMINATION**

W. Mark Russo, Esq. (“Receiver”), in and only in his capacity as the duly appointed Receiver for Spectrum Analytical, Inc. (“Spectrum”) and Hanibal Technology LLC (“Hanibal Technology”) (collectively the “Receivership Entities”), hereby moves for relief under Bankruptcy Code §543(d)(1) and requests an Emergency Determination pursuant to Local Bankruptcy Rule 9013(g).

In support of the within Motion, the undersigned respectfully submits the accompanying Memorandum of Law in Support of said Motion.

W. Mark Russo, Esq., as and only as Receiver for
Spectrum Analytical, Inc. and Hanibal Technology
LLC

By their attorneys,

/s/ W. Mark Russo

W. Mark Russo (BBO# 554047)

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Dated: May 1, 2015

CERTIFICATION OF SERVICE

I hereby certified that on this 1st day of May, 2015, I filed and serve this document through the CMECF electronic filing system on the following parties:

- Michael B. Katz mkatz@baconwilson.com
- Richard King USTPRegion01.WO.ECF@USDOJ.GOV
- Spencer A. Stone sstone@baconwilson.com, Dwayne@baconwilson.com

/s/ W. Mark Russo

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